

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE:

CASSANDRA L. CAMPBELL

Debtor

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Case Number: 24-51451-KMS

CHAPTER 13

**MOTION TO ABANDON PROPERTY AND
FOR RELIEF FROM THE AUTOMATIC STAY**

NOW COMES, Red Oak Rentals, LLC (hereinafter referred to as Creditor), by and through counsel, pursuant to 11 USC 362(d) and files this Motion to Abandon and for Relief from Stay. In support thereof, the Creditor would show unto the Court the following:

This Court has jurisdiction over the subject matter herein and the parties hereto pursuant to 28 USC §1334, 11 USC §506, 11 USC §§1322, 1325, along with other related statutes and rules. This is a core proceeding as defined by 28 USC §157.

1. The Debtor's Confirmed Plan [Doc. 20] correctly identifies the agreement between the parties as a lease agreement, and proposes to assume the lease with payments to be made directly by the Debtor to the Creditor.
2. The Debtor's account is past due by seven (7) lease renewal payments and pursuant to the lease agreement between the parties, the lease has terminated. The last lease renewal payment was made in March, 2025 for a payment which was due in October, 2024.
3. The Debtor has defaulted under the terms of the agreement and has failed to make necessary payments to renew the lease. Thus the lease has terminated, and Red Oak seeks an order terminating the stay and abandoning the property to allow Red Oak to enforce its rights to the property.
4. For the reasons discussed herein, the Creditor requests this Court grant its Motion for Relief from the Stay, abandon the property, and allow the Creditor to proceed with repossession of said property by any method authorized by state law.
5. Should this Court deny the Creditor's Motion for Relief from the Automatic Stay, the Creditor requests that the Court direct that the full default amount, \$1,352.97, be paid within 10 days of the entry of an order, and the stay be immediately lifted and terminated, without further notice or order, as to the Creditor in the event that the Debtor should default on any future payments.

WHEREFORE, Creditor Red Oak Rentals, LLC requests this Court grant its Motion to Abandon Property and for Relief from the Automatic Stay, and for such other relief as this Court may deem appropriate.

RESPECTFULLY SUBMITTED,

Red Oak Rentals, LLC

BY: Wilkins Patterson, P.A.

/s/ Nicholas D. Garrard

Nicholas D. Garrard
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CERTIFICATE OF SERVICE

I do hereby certify that on this date I served a copy of the foregoing Motion to Abandon Property and for Relief from the Automatic Stay, by filing the foregoing with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record.

T.C. Rollins, Jr.
Attorney for Debtor

David Rawlings
Ch. 13 Trustee

Office of the U.S. Trustee
USTPRegion05.JA.ECF@usdoj.gov

And via first-class mail:
Cassandra Campbell
244 County Road 5286
Bay Springs, MS 39422

This the 3rd day of July, 2025.

/s/ Nicholas D. Garrard
Nicholas D. Garrard